

1 James D. Livingstone
2 38 Old Wood Rd.
3 North Attleboro, MA
4 Tel.: (508) 695-1615
5 Attorney for Plaintiff

MAY 25 2006

For The Northern Mariana Islands
By _____
(Deputy Clerk)

5 UNITED STATES DISTRICT COURT
6 FOR THE
7 NORTHERN MARIANA ISLANDS

8 **TOSHIHIRO TAKAHASHI,**

9 Plaintiff,

10 vs.

11 **MAEDA PACIFIC CORPORATION,**

12 Defendant.

CIVIL ACTION NO. CV 05-0026

**MOTION FOR ADMISSION PRO HAC
VICE FOR JAMES D. LIVINGSTONE**

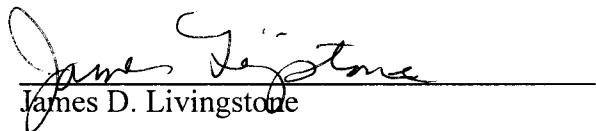
Date: _____

Time: _____

Honorable Chief Judge Alex R. Munson

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15 COMES NOW, James D. Livingstone, moves to appear in the above-captioned action *pro
16 hac vice* and represent the plaintiff, Mr. Toshihiro Takahashi, as co-counsel with the Torres
17 Brothers, LLC. Attached to this motion is a declaration from James D. Livingstone and a
18 consent from Victorino DLG. Torres, both in compliance with Local Rule 83.5(d), as well as a
19 proposed order and a check for \$250.

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22 DATED: 5/25/2006.


James D. Livingstone

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DECLARATION OF JAMES D. LIVINGSTONE

I, James D. Livingstone, swear under penalty of perjury as follows:

1. I seek admission to this Court *pro hac vice* to represent the plaintiff in the Civil Action entitled *Takahashi v. Maeda Construction Co.*, Civil Action No. 05-0026 (the “Action”).

2. My residence and office is 38 Old Wood Rd., North Attleboro, MA 02760. I lived on Saipan until I recently changed my residence to Massachusetts.

3. I graduated from George Washington University Law School in May 1998.

4. I was admitted to the Massachusetts bar in December 1998, the District of Columbia bar in April 1999, and the bar for the Court of Appeals for the Ninth Circuit in 2003. I am still and active member of all three bars. I was a temporary member of the bars of this Court and the Commonwealth of the Northern Mariana Islands as a member of the Commonwealth's Attorney General's Office from August 2002 until I resigned from the government in March 2006.

5. I am in good standing and eligible to practice in all the courts to which I have been admitted and I am not currently suspended or disbarred from any court.

6. I have never previously made a *pro hac vice* application to this Court.

7. Victorino Torres and the Torres Brothers, LLC firm have represented the plaintiff in the Action and will continue to do so. Mr. Torres' contact information is: Torres Brothers, LLC, P.O. Box 501856, Saipan, MP 96950, Bank of Guam Bld. 3rd Flr., tel.: (670) 233-5506, fax: (670) 233-5510. If my application is granted, I will serve as co-counsel with Mr. Torres.

I declare under penalty of perjury that the foregoing is true and correct. Executed on
Saipan, MP on May 25, 2006.

James D. Livingstone
James D. Livingstone

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3 **WRITTEN CONSENT OF VICTORINO TORRES**

4 I, Victorino DLG. Torres, am counsel of record in the Civil Action entitled *Takahashi v.*
5 *Maeda Construction Co.*, Civil Action No. 05-0026. I consent to the involvement of James D.
6 Livingstone as counsel of record with me in the action.

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8 DATED: 05 / 29 / 2006


9 Victorino Torres
10 Torres Brothers, LLC
11 Attorney for Plaintiff

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**UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS**

TOSHIHIRO TAKAHASHI,) **CIVIL ACTION NO. CV 05-0026**
Plaintiff,)
vs.)
MAEDA PACIFIC CORPORATION,)
Defendant.) **[PROPOSED] ORDER**

THIS COURT having reviewed the motion for admission *pro hac vice* of James D. Livingstone hereby grants the motion.

IT IS THEREFORE ORDERED, that Mr. Livingstone may serve as co-counsel with the law firm of Torres Brothers, LLC to represent the plaintiff in this action.

SO ORDERED: / /

CHIEF JUDGE ALEX R. MUNSON